

1) I am an attorney, admitted and in good standing, *inter alia*, to the bars of the Commonwealth of Massachusetts and the State of New York and, *inter alia*, the U.S. District Court for the District of Massachusetts, and admitted *pro hac vice* basis in the Northern District of Illinois. I am counsel to the Plaintiff, Vikram Grover (hereinafter “Grover” or “Mr. Grover”), in the above-captioned case. According to my understanding, Jeffery R. Tone, Esq. is admitted and in good standing to the bar of the State of Illinois and the U.S. District Court for the Northern District of Illinois, and serves as the Plaintiff’s local counsel for the in the above-captioned case.

2) I make this Affidavit in support of the Plaintiff's Request for Entry of Default Pursuant to Rule 55(a) against Defendant Wilton UK (Group), Limited, (hereinafter the "Defendant" or "or "Wilton-UK"), in the pending action. I make this Affidavit based upon personal knowledge, and from information provided to me by the investigator engaged by my law firm (hereinafter the "Firm"), and from the UK process server, as engaged in the instant litigation.

3) According to my understanding, my Firm, its investigator and its UK process server conducted research to locate the Defendant, or the address of an officer or agent who is authorized to accept service of process in order to join the Defendant in this instant litigation.

4) According to my understanding, on or about December 1, 2021, the Plaintiff was able to effectuate service of process of the Defendant, Wilton-UK at 26 Grosvenor Street, Mayfair, London W1K 4QW, U.K., and Tanya Moore, a receptionist for Wilton-UK confirmed that she was authorized to accept service on behalf of Wilton-UK. Tanya Moore indicated that she would pass on to James Robson, Head of Financial Services. *See* Summons and Return of Service, attached, restated and incorporated by reference herein as **Exhibit A**.

5) According to my understanding, the Defendant, Wilton-UK, is not, or has not been, an infant or incompetent person or an incapacitated person, nor a person in the military service, as set forth in 50 U.S.C. §§ 501, *et seq.*

6) As of the date hereof, the Defendant, Wilton-UK, has failed to file its Answer, responsive papers or otherwise defend the instant litigation in a timely manner, and the time has expired for the same.

Signed under the pains and penalties of perjury, this 23rd day of December, 2021.

Dated: December 23, 2021

/s/ Philip Giordano  
Philip Giordano

**CERTIFICATE OF SERVICE**

I, Philip M. Giordano, do hereby certify that on this 23rd day of December, 2021, I caused to be served a true and correct copy of the Giordano Affidavit in Support of Plaintiff Vikram Grover's Rule 55(a) Request for Entry of Default for Wilton-UK as filed by and through the District Court's electronic filing/ECF system and that such true copy is available for downloading and viewing by all parties and counsel of record

Dated: December 23, 2021

/s/ Philip M. Giordano  
Philip M. Giordano